

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: PETITION OF BAY STATE GAS COMPANY  
FOR APPROVAL OF REVISED TARIFFS**

**DTE 05-27**

**FOURTH SET OF INFORMATION REQUESTS OF LOCAL 273**

**UWUA 4-1**

Regarding the signing of the outsourcing contract with IBM that was announced on or about June 21, 2005:

(a) Please provide the number of Bay State employees who will be affected, whether through being assigned to IBM; severed from employment; or in any other manner. To the extent firm numbers are not available, please provide the company's best estimate. For each employee whose job may be affected, please include the employee's age, gender, and length of service with the company (but do not include the employee's name; use either initials or sequential numbers to identify each employee).

(b) Also provide the information requested broken down by geographic division (Brockton, Springfield, Lawrence), and department or function (e.g., call center, billing, etc.)

(c) Please provide the Company's best estimate of when any of the job changes resulting from or connected to the IBM outsourcing contract will be implemented. To the extent the effective dates of any job changes vary by geographic division or department, provide the various dates when those changes will occur.

(d) Please provide all written documents and e-mails that in any way discuss, describe or estimate the job changes that will occur as a result of the contract with IBM, including but not limited to reassignments of employees from Bay State to IBM; severance of any employees; job reclassifications; relocation of jobs from their present location to any other location; and changes in the terms or conditions of employment.

(e) Please provide all written documents (including e-mails) and summarize all verbal communications between NiSource/Bay State/NiSource affiliates and IBM regarding NiSource's/Bay State's/NiSource affiliates' representations to IBM about the "assignment" provisions of Local 273's collective bargaining agreements (E.g., Article XVI, § 2 of the Local 273 "physical" workers C.B.A.) and any comparable provisions of other C.B.A.s

(f) Please provide a copy of all written communications to Bay State employees regarding the IBM outsourcing contract and/or any related job changes, including

communications with Local 273, with any other union, and with workers not represented by any union. For verbal communications, please list the date and summarize the content of all such communications (teleconference calls, meetings between supervisors and front-line workers, etc.)

(g) Please provide any and all documents that list, describe or estimate the wage rates, salaries, benefits and other compensation that IBM will offer to any of the Bay State employees who may be reassigned to IBM.

(h) To the extent the company's reply to any of the sub-questions in UWUA 4-1 states that the requested information is not currently available, please update, revise or supplement the response as soon as any such information becomes available.

Respectfully Submitted,

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DATED: June 21, 2005